

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re Kevin Taylor)
) Case No. 21-40405
) Chapter 13
)
 Debtor.) Response Due: 7/27/2021

To: Bungalow Series IV Trust
C/O SN Servicing Corporation
PO Box 660820
Dallas, TX 75266

SN Servicing Corporation
Attn: President Robin Arkley
323 55th Street
Eureka, CA 95501

David Noyce
1512 Main Street, Suite 130
Grandview, MO 64030

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY JULY 27, 2021.

YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

OBJECTION TO CLAIM 2

Kevin Taylor, Debtor herein, objects to your Claim No. 2, in the amount of \$319,357.07 for the following reason(s):

Since the filing of this bankruptcy, Debtor has been approved for a loan modification. Therefore, the claim should not include any mortgage arrearage on the date of filing.

/s/ Andrew Kirkwood Smith
26A North Central Avenue
Clayton, MO 63105
314.740.2989 (phone)
314.781.2695 (fax)
Attorney for Debtor

Certificate of Service

I. I certify that a true and correct copy of the foregoing document was filed electronically on July 6, 2021 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Andrew Kirkwood Smith
Andrew Kirkwood Smith

II. I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on July 6, 2021:

Bungalow Series IV Trust
C/O SN Servicing Corporation
PO Box 660820
Dallas, TX 75266

SN Servicing Corporation
Attn: President Robin Arkley
323 55th Street
Eureka, CA 95501

David Noyce

1512 Main Street, Suite 130
Grandview, MO 64030

Kevin Taylor
4043 Sun Tide Court
Arnold, MO 63010

/s/ Andrew Kirkwood Smith
Andrew Kirkwood Smith
Attorney for Debtor